

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

CONGHUA YAN,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. [4:23-cv-00758-P-BJ]
)	
THE STATE BAR OF TEXAS, a private company,)	
THE BARROW FIRM, a private company,)	
LESLIE STARR BARROWS, in individual capacity,)	
as member of the State Bar of Texas,)	
WILLIAM ALBERT PIGG in individual capacity,)	
as member of the State Bar of Texas,)	
SAMANTHA YBARRA, in individual capacity,)	
as member of the State Bar of Texas,)	
LUIS JESUS MARIN in individual capacity,)	
as member of the State Bar of Texas,)	
and official capacity as Assistant Disciplinary)	
Counsel for the Office of the CDC,)	
DANIEL EULALIO MARTINEZ)	
in individual capacity,)	
as a member of the State Bar of Texas,)	
and official capacity as Assistant Disciplinary)	
Counsel for the Office of the CDC,)	
RACHEL ANN CRAIG in individual capacity,)	
as member of the State Bar of Texas,)	
and official capacity as Assistant Disciplinary)	
Counsel for the Office of the CDC,)	
LORI L. DEANGELIS in individual capacity,)	
as member of the State Bar of Texas,)	
and official capacity as Associated Judge,)	
TARRANT COUNTY,)	
Defendants.)	
)	

MOTION FOR LEAVE TO AMEND ORIGINAL COMPLAINT

TO THE HONORABLE JUDGE OF NORTHERN DISTRICT OF TEXAS:

COMES NOW, Plaintiff, Conghua Yan, respectfully submits this Motion for Leave to Amend Original Complaint, pursuant to Federal Rules of Civil Procedure 15(a)(2).

1. On July 21st, 2023, the Plaintiff filed an original complaint against The State Bar of Texas et al, defendants. ECF No. 1,

2. Plaintiff mistakenly had a typo, using “The Barrow Firm” as a party in the Caption, but typed the name correctly in the summon. “The Barrow Firm” as a party is misnomer.

3. The Court clerk neither spotted this typo nor asked for a correction. The summon was issued with the correct spelling as “The Barrows Firm”.

4. There are 2 more typos in the context part of the original complaint. In the rest of the pleading, “The Barrows Firm” was correctly spelled.

5. The Plaintiff requests, with the intention to correct “The Barrow Firm” to “The Barrows Firm,” that no other context in the original pleading be amended.

6. Under Federal Rules of Civil Procedure 15(a)(2), “a party may amend its pleading [with] the court’s leave” and that “[t]he court should freely give leave when justice so requires.” Allowing Plaintiffs to file the amended complaint would serve justice and promote judicial efficiency. Further, there would be no substantial or undue prejudice, bad faith, undue delay, or futility.

7. As of today, Defendant, the Barrows Firm has not been served. The proposed amendment does not affect any other parties except than the party of the Barrows Firm. Plaintiff requests this motion to be granted so a correct copy of pleading can be served to the Barrows Firm without causing undue delay.

8. Based on the above, Plaintiff respectfully requests that the Court, pursuant to Federal Rules of Civil Procedure 15(a)(2), grant Plaintiff leave of Court to make a such amendment.

Respectfully submitted,

/s/ Conghua Yan
Conghua Yan, Pro Se Plaintiff
[Conghua Yan] [2140 E Southlake Blvd, Suite L-439] [Southlake, Texas 76092] [214-228-1886]
/[arnold200@gmail.com]

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CONGHUA YAN,)	
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Plaintiff,)	
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v.)	Case No. [4:23-CV-00758]
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The State Bar of Texas et al,)	
)	
Defendants.)	
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CERTIFICATE OF CONFERENCE

On August 24th, 2023, Plaintiff consulted with Ms. Amanda Kates, counsel for the Defendants. Plaintiff notified counsel of his intent to file a Motion for Leave to Amend Original Complaint. Ms. Amanda Kates has expressed her opinion to,

☐ Opposed the Motion.
☒ Unopposed Motion.

On August 24th, 2023, Plaintiff consulted with Mr. Keith Ogle, counsel for the Defendant. Plaintiff notified counsel of his intent to file a Motion for Leave to Amend Original Complaint. Mr. Keith Ogle has expressed his opinion to,

☒ Opposed the Motion.
☐ Unopposed Motion.

On August 24th, 2023, Plaintiff requested to have a conference with Mr. William Pigg, counsel for the Defendant. Mr. William Pigg refused to respond.

/s/ Conghua Yan
Conghua Yan, Pro Se Plaintiff
[Conghua Yan] [2140 E Southlake Blvd, Suite L-439] [Southlake, Texas 76092] [214-228-1886]
[arnold200@gmail.com]

CERTIFICATE OF SERVICE

On (August 25th, 2023) I, Conghua Yan, filed (Motion for Leave to Amend Original Complaint [ECF No. 25]) through the court CM/ECF system.

I hereby certify that I have served the forgoing document on all counsels and/or pro se parties of record in a manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Conghua Yan

Conghua Yan, Pro Se Plaintiff

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